



Mel Carnahan, Governor • David A. Shorr, Director

DEPARTMENT OF NATURAL RESOURCES

DIVISION OF ENVIRONMENTAL QUALITY
P.O. Box 176 Jefferson City, MO 65102-0176

MEMORANDUM

DATE: APR 2- 1996

TO: John A. Young, Director
Division of Environmental Quality

FROM: Roger D. Randolph, Director
Air Pollution Control Program

A handwritten signature in dark ink, appearing to read "RDR", is written over the name "Roger D. Randolph" in the "FROM" field.

Subject: Definition of "Country Grain Elevator"

This is in regards to the Air Pollution Control Program's (APCP's) interpretation of the EPA Guidance on Calculating Potential to Emit and Other Guidance for Grain Handling Facilities ("Guidance"). The Guidance will apply to facilities that consist of ONLY country grain elevators and no other components (e.g., feed or milling operations, fertilizer plants).

The EPA AP-42 Interim version of Section 9.9.1, Grain Elevators and Processes, states that Country Grain Elevators are generally smaller elevators that receive grain by truck directly from farms during harvest season. These elevators sometimes clean or dry grain before it is transported to terminal elevators or processors. The Guidance states that a Country Grain Elevator is any grain elevator that receives more than 50 percent of it's grain from farmers in the immediate vicinity during harvest season. Although "immediate vicinity" may be subject to some broad interpretation, the APCP believes that elevators within an incorporated area of population greater than 50,000 do not qualify as country.

For information on how many Missouri facilities will be affected, see attached memo.

RDR:smp

Attachment